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VIA ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Petition for Waiver of Rules Requiring Support of TTY Technology Report GN Docket No. 15-178

Dear Ms. Dortch:

Upper Midwest Wireless, LLC (“UMW”), by its counsel, hereby reports on its progress toward meeting the Federal Communications Commission (“FCC” or “Commission”) real-time text (“RTT”) technology requirements in satisfaction of the reporting condition of its text telephone technology (“TTY”) waiver.

UMW was a member of the Competitive Carriers Association (“CCA”) on April 20, 2016 when the Commission issued the *CCA Waiver Order*¹ granting CCA members a waiver of the Commission’s TTY-related requirements for IP-enabled networks (“CCA Waiver”), and UMW elected to participate in the CCA Waiver.² UMW also was a member of CCA when the Commission extended the time period of the CCA Waiver to each carrier’s earliest

¹ *Petition for Waiver of Rules Requiring Support of TTY Technology*, Order, 31 FCC Rcd 3778 (2016) (“*CCA Waiver Order*”).

² See Competitive Carriers Association, Preliminary Report, GN Docket No. 15-178 (filed July 19, 2016).

date of Real-Time Text (“RTT”) compliance, or June 30, 2020, in the *RTT Technology Order*.³

UMW, however, is no longer a member of CCA, and accordingly, CCA’s fourth progress report that is due April 20, 2018 will not include UMW. UMW has reviewed a draft of CCA’s progress report, however, and is in the same position as the CCA members not yet deploying an alternative accessibility solution. UMW remains committed to working to implement industry standard capabilities to support interoperable RTT services or alternative accessibility solutions, where applicable. UMW requests the Commission consider this letter as compliance with the reporting requirements for the progress report due April 20, 2018. Moving forward, UMW will file its own progress reports with the Commission.⁴

Respectfully submitted,



Donald L. Herman, Jr.
Clare Liedquist
Counsel for Upper Midwest Wireless

³ *In re Transition from TTY to Real-Time Text Technology Petition for Rulemaking to Update the Commission’s Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568 (2016).

⁴ Although UMW is no longer a CCA member, UMW believes that the CCA Waiver continues to apply to UMW since UMW was a member when the FCC granted and extended the CCA Waiver. Out of an abundance of caution and to the extent the FCC finds it necessary, however, UMW requests that the FCC clarify that the CCA Waiver continues to apply to UMW.